

# WORKING SOLUTIONS

July 7, 2025

**VIA ECF**

Honorable Tonianne J. Bongiovanni  
United States District Court, District of New Jersey  
402 East State Street  
Trenton, New Jersey 08608

**Re: *Covachuela v. Jersey Firestop, LLC et al.*; Civil Action No. 3:20-cv-08806  
Joint Status Update**

Dear Judge Bongiovanni:

On June 29<sup>th</sup> Defendants' counsel notified Plaintiffs' counsel that Defendants intend to oppose Plaintiff's motion to amend the complaint. As such, the parties have met and conferred and agreed to the following proposed briefing schedule:

- Plaintiffs will file their motion to amend by August 15, 2025
- Defendants' will file their opposition by September 5, 2025; and
- Plaintiffs will file their reply by September 19, 2025.

Should the Court have any questions, please do not hesitate to contact the undersigned counsel.

Respectfully,

/s/ Rachel Haskell  
**Rachel Haskell, Esq.**  
**Counsel for Plaintiffs**

/s/ Brad M. Kushner  
**Brad M. Kushner, Esq.**  
**Counsel for Defendants**

It is on this 9<sup>th</sup> day of July, 2025,  
SO ORDERED.

s/Tonianne J. Bongiovanni  
Hon. Tonianne J. Bongiovanni, U.S.M.J.